

1 **SAO**

2 Rusty Graf, Esq.  
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*Counsel for Plaintiff*

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 DANIEL LUCERO,

10 Plaintiff

11 v.

12 ISABEL GUZMAN, ADMINISTRATOR  
13 and SMALL BUSINESS  
14 ADMINISTRATION

15 Defendants.

CASE NO.: 2:21-cv-00915-RFB-MDC

**Stipulation and Order to Extend Time to File a  
Joint Pretrial Order**

16 Pursuant to LR IA 6-1 and LR 26-3, the parties request an extension from October 31,  
17 2024, to November 14, 2024, of the deadline for the Plaintiff and Federal Defendants to file a  
18 Joint Pretrial Order. The extension is necessary because undersigned counsel is still digging out  
19 from the damage caused by Hurricane Helene and the additional time is needed to go over the  
20 exhibits and list of witnesses prior to finalizing the Joint Pretrial Order. Accordingly, the parties,  
21 through counsel, stipulate and respectfully request that the deadline to file the Joint Pretrial Orders  
22 is extended to **November 15, 2024**.

23 This is the third request to extend the time to file Joint Pretrial Orders.

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1 This third request for an extension of time are not sought for any improper purpose  
2 including delay.

3 Respectfully submitted this 30th day of October 2024.

4 **BLACK & WADHAMS**

**JASON M. FRIERSON, ESQ.**  
**United States Attorney**

5  
6 /s/ Rusty Graf

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Counsel for Plaintiff

/s/ Virginia T. Tomova

VIRGINIA T. TOMOVA, ESQ.  
Assistant United States Attorney

12  
13 **IT IS SO ORDERED:**

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15 **UNITED STATES DISTRICT COURT JUDGE**

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17 DATED: October 31, 2024

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## Diane Meeter

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**From:** Tomova, Virginia (USANV) <Virginia.Tomova@usdoj.gov>  
**Sent:** Wednesday, October 30, 2024 4:51 PM  
**To:** Diane Meeter; Rusty Graf  
**Cc:** Sasha Araujo; Pisan, Liam (USANV); 'Amanda Moreno'  
**Subject:** RE: Lucero v. SBA Draft of JPTO  
**Attachments:** SAO to extend the time to Joint Pretrial Orders (3rd request) (0001).docx

**Follow Up Flag:** Follow up  
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Hi Diane, please see attached. I just made minor changes.

If there are no other change, you have permission to e-sign on my behalf.

Thank you.



Virginia T. Tomova  
Assistant United States Attorney  
District of Nevada  
501 Las Vegas Blvd South, Suite 1100  
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**From:** Diane Meeter <dmeeter@blackwadhams.law>  
**Sent:** Wednesday, October 30, 2024 2:59 PM  
**To:** Tomova, Virginia (USANV) <VTomova@usa.doj.gov>; Rusty Graf <rgraf@blackwadhams.law>  
**Cc:** Sasha Araujo <saraujo@blackwadhams.law>; Pisan, Liam (USANV) <LPisan@usa.doj.gov>; 'Amanda Moreno' <amanda@pinesfederal.com>  
**Subject:** [EXTERNAL] RE: Lucero v. SBA Draft of JPTO

Attached is the SAO to Extend Time for Joint Pretrial Orders. Please review and make any necessary changes and return to us. If no changes are needed, please provide permission to submit with your electronic signature.

Diane Meeter  
Legal Assistant to Rusty Graf, Esq.

